1	BRIAN D. NETTER Deputy Assistant Attorney General	
2	MARCIA BERMAN Assistant Branch Director	
3	STUART J. ROBINSON	
4	Senior Counsel   R. CHARLIE MERRITT	
5	Trial Attorney U.S. Department of Justice	
6	Civil Division, Federal Programs Branch 1100 L Street NW	
7	Washington, DC 20005 (202) 616-8098	
8	E-mail: robert.c.merritt@usdoj.gov	
9	Attorneys for Defendants	
10	UNITED STATES I	DISTRICT COURT
11	FOR THE NORTHERN DIS	
12		
13	THE PEOPLE OF THE STATE OF CALIFORNIA,	No. 3:17-cv-7106-SK
14	Plaintiff,	
15	,	
16	V.	
17	UNITED STATES DEPARTMENT OF EDUCATION, et al.,	
18	Defendants.	
19		
20	MARTIN CALVILLO MANRIQUEZ, et al.,	No. 3:17-cv-7210-SK
21	Plaintiffs,	
22	V.	JOINT STATUS REPORT
23	UNITED STATES DEPARTMENT OF	
24	EDUCATION, et al.,	
25	Defendants.	
26		
27		
28		

Joint Status Report 3:17-cv-7106-SK; 3:17-cv-7210-SK

The parties hereby submit the following status report in response to the Court's July 17, 2023 order.

As noted in prior reports, the parties are working towards a negotiated dismissal of the above-referenced litigation in light of the Department's progress effectuating a group discharge for students who attended Corinthian Colleges, Inc. See ECF No. 379 (Calvillo Manriquez); ECF No. 186 (California). At this time, nearly 100% of Corinthian borrowers who applied for borrower defense relief have had their loans discharged. And more than 377,000 Corinthian borrowers who did not apply for relief have also had their loans discharged, constituting approximately 76% of the total number of non-applicant discharges the Department expects to grant as part of the Corinthian group discharge.

The parties continue their work preparing the documents necessary for dismissal, which has included the sharing of drafts, and expect to request a conference with the Court to discuss next steps once those documents are finalized. The parties have made good progress recently, and believe that additional time would be beneficial to allow them to continue their negotiations. The parties respectfully request that the Court set a further deadline for a status report in 45 days.

Dated: September 18, 2023

Respectfully submitted,

BRIAN D. NETTER

Deputy Assistant Attorney General

MARCIA BERMAN Assistant Branch Director

/s/ R. Charlie Merritt STUART J. ROBINSON Senior Counsel R. CHARLIE MERRITT Trial Attorney U.S. Department of Justice

Civil Division, Federal Programs Branch

1100 L Street NW Washington, DC 20005 (202) 616-8098

È-mail: robert.c.merritt@usdoj.gov

Attorneys for Defendants

19

20

21

22 23

24

25

26 27

28

1	/s/ Bernard A. Eskandari ROB BONTA
2	Attorney General of California NICKLAS A. AKERS
3	Senior Assistant Attorney General BERNARD A. ESKANDARI (SBN 244395)
4	Supervising Deputy Attorney General AMOS E. HARTSTON (SBN 186471)
5	Deputy Attorney General 300 South Spring Street, Suite 1702
6	Los Angeles, CA 90013 Tel: (213) 269-6348
7	Fax: (213) 897-4951 Email: bernard.eskandari@doj.ca.gov
8	Attorneys for Plaintiff the People of the State
9	of California
10	JOSEPH JARAMILLO (SBN 178566)
11	Housing & Economic Rights Advocates
12	3950 Broadway, Suite 200 Oakland, CA 94611
13	Tel.: (510) 271-8443 Fax: (510) 868-4521
14	Email: jjaramillo@heraca.org
15	<u>/s/ Eileen M. Connor</u>   EILEEN M. CONNOR (SBN 248856)
16	Project on Predatory Student Lending, Inc. 769 Centre Street, Suite 166
17	Jamaica Plain, MA 02130 Tel.: (617) 322-2271
18	Fax: (617) 781-9625 Email: econnor@ppsl.org
19	Attorneys for Class Plaintiffs
20	
21	
22	
23	
24	
25	
26	
27	
28	

Joint Status Report 3:17-cv-7106-SK; 3:17-cv-7210-SK